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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, *et al.*, on behalf of  
 themselves and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-3664-LHK-SVK

**ADMINISTRATIVE MOTION TO SEAL  
 PORTIONS OF JOINT SUBMISSION  
 RE: NOMINATIONS FOR A SPECIAL  
 MASTER AND PROPOSED ORDERS**

Referral: Hon. Susan van Keulen, USMJ

Pursuant to Federal Rule of Civil Procedure 26(c), and Civil Local Rules 7-11 and 79-5, Plaintiffs respectfully submit this Administrative Motion to File Under Seal the following Documents as indicated below.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Joint Submission Re: Nominations for a Special Master and Proposed Orders	Plaintiffs	Entire Text	Contains Material Satisfying Rule 26(c) Standard
Exhibit A-1 to A-5	Plaintiffs	Entire Exhibits	Contains Material Satisfying Rule 26(c) Standard

Although there is “a general right to inspect and copy public records and documents, including judicial records and documents,” *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 597 & n.7 (1978), the presumption of public access can be overcome.” *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1178-79 (9th Cir. 2006) (citations omitted). A showing of “good cause” for a protective order under Rule 26(c) is enough to justify filing documents attached to a non-dispositive motion under seal. *Id.* at 1179.

Here, good cause exists to seal the above-referenced portions of the parties’ Joint Submission re Special Master Nominations and Proposed Orders. The material sought to be sealed risks severe reputational harm to Plaintiffs’ nominee, endangers the individual’s current and future engagements as a special master, and constitutes an effort to impugn the individual’s qualifications without the benefit of admissible evidence or an opportunity for Plaintiffs’ nominee to respond. Bonn Decl. ¶ 4. Sealing the documents identified above will reduce the risk that Plaintiffs’ nominee will suffer such unnecessary damage. *Id.* For these reasons, Plaintiffs respectfully request that the Court grant the instant motion. *See Compliance Servs. of Am., LLC v. Houser Holdings, LLC*, No. 13-CV-01269-JST, 2014 WL 1389474, at \*2 (N.D. Cal. Apr. 9, 2014) (granting motion to seal where paragraphs at issue could be used for scandalous or libelous purposes).

In accordance with Civil Local Rule 79-5(d)(1), the following attachments accompany this motion:

- 1           1. the Declaration of Amanda Bonn in Support of Plaintiffs' Administrative Motion
- 2           to Seal;
- 3           2. a proposed order that lists in table format the documents sought to be sealed;
- 4           3. a sealed version of the parties' Joint Submission re Special Master Nominations
- 5           and Proposed Orders and Exhibit A-1 to A-5.

6           Should the Court be inclined be deny the instant motion, Plaintiffs respectfully request the  
7 opportunity to submit a declaration from Plaintiffs' nominee, who is currently out of the country

8  
9 Dated: June 29, 2021

Respectfully submitted,

10  
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**CERTIFICATE OF SERVICE**

I, Amanda Bonn, declare:

I am a citizen of the United States and employed in the County of Los Angeles, California. I am over the age of 18 and not a party to the within action; my business address is 1900 Avenue of the Stars, Suite 1400, Los Angeles, CA 90067.

On June 29, 2021, I caused to be served the following documents described as:

**Sealed Versions of Joint Submission Re: Nominations for a Special Master and Proposed Orders and Exhibits A-1 to A-5.**

By electronic mail transmission from [agregory@susmangodfrey.com](mailto:agregory@susmangodfrey.com) on June 29, 2021, by transmitting a PDF format copy of such document to each such person at the e-mail addresses listed below. The document was transmitted by electronic transmission and such transmission was reported as complete and without error:

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12 Executed on June 29, 2021, at Los Angeles, California.

13 /s/ Amanda Bonn

14 Amanda Bonn